

MRM:SSA
F. #2025R00294

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

MARK BEHRJE,

Defendant.
----- X

THE GRAND JURY CHARGES:

COUNT ONE

(Attempted Coercion and Enticement of a Minor)

1. In or about and between August 2024 and April 2025, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MARK BEHRJE, using one or more facilities and means of interstate and foreign commerce, to wit: a mobile telephone, the Internet and mobile Internet applications, did knowingly and intentionally attempt to persuade, induce, entice and coerce an individual who had not attained the age of 18 years, to wit: an individual whom BEHRJE believed to be a six-year-old female, to engage in sexual activity for which a person can be charged with one or more criminal offenses, to wit: sexual abuse in the first degree, in violation of New York Penal Law Sections 130.65(3), 130.65(4) and 110.00.

(Title 18, United States Code, Sections 2422(b) and 3551 et seq.)

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
★ JUL 10 2025 ★
LONG ISLAND OFFICE

INDICTMENT

Cr. No.

(T. 18, U.S.C., §§ 2252(a)(2), 2252(b)(1),
2253(a), 2253(b), 2422(b), 2428(a) and
3551 et seq.; T. 21, U.S.C., § 853(p))

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BULSARA, J.
WICKS, M.J.

COUNTS TWO THROUGH SIX
(Receipt and Distribution of Child Pornography)

2. On or about the dates and times set forth below, within the Eastern District of New York and elsewhere, the defendant MARK BEHRJE did knowingly and intentionally receive and distribute one or more visual depictions, to wit: the digital videos and images depicted in the following computer files:

Count	Approximate Date and Time	File Name
TWO	February 11, 2025 at 9:26 a.m.	rape baby 2 year.webm
THREE	February 11, 2025 at 11:18 a.m.	mommy opens ass.webm
FOUR	February 17, 2025 at 8:37 a.m.	ass destruction hurt.webm
FIVE	February 17, 2025 at 9:37 a.m.	Charchar 2.webm
SIX	February 17, 2025 at 5:33 p.m.	pedomon and 4 month old pussy.webm

using a means and facility of interstate and foreign commerce, which visual depictions had been mailed, and had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been mailed and so shipped and transported, by any means including by computer, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions were of such conduct.

(Title 18, United States Code, Sections 2252(a)(2), 2252(b)(1) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT ONE

3. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count One, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2428(a), which requires the forfeiture of:

(a) any property, real or personal, that was used or intended to be used to commit or to facilitate

the commission of such offense; and (b) any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 2428(a); Title 21, United States Code, Section 853(p))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS TWO THROUGH SIX

5. The United States hereby gives notice to the defendant that, upon his conviction of the offenses charged in Counts Two through Six, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2253(a), which requires the forfeiture of: (a) any visual depiction described in Sections 2251, 2251A, 2252, 2252A, 2252B or 2260 of Title 18 of the United States Code, or any book, magazine, periodical, film, videotape or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of such sections; (b) any property, real or personal, constituting,

or traceable to, gross profits or other proceeds obtained from such offenses; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses, or any property traceable to such property.

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), to seek forfeiture of any other

property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 2253(a) and 2253(b); Title 21, United States Code, Section 853(p))

A TRUE BILL

FOREPERSON

By David Pittluck, Asst. U.S. Attorney
JOSEPH NOCELLA, JR.
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK